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May 22, 2019

The Honorable Leonard P. Stark
United States District Court
For the District of Delaware
844 North King Street
Wilmington, DE 19801

VIA ELECTRONIC FILING

Re: *H. Lundbeck A/S v. Apotex Inc. et al.*, C.A. No. 18-088 (LPS) (consolidated)

Dear Chief Judge Stark:

The parties in the above-referenced matter write to request the scheduling of a discovery teleconference pursuant to Paragraph 8.m of the Scheduling Order to address a dispute relating to the Protective Order in this action (D.I. 132), specifically Plaintiffs' objection to MSN's In-House Designee as being proper under Paragraph 5(e) of the Protective Order.

Counsel for the parties held a verbal meet-and-confer by telephone on May 17, 2019. The following attorneys participated in the meet-and-confer:

For Plaintiffs:

Delaware Counsel: Megan Dellinger of Morris Nichols Arsht & Tunnell LLP

Lead Counsel: Brianne Bharkhda and Allison Schmitt of Covington & Burling LLP

For Defendants MSN Laboratories Private Limited, MSN Pharmaceuticals, Inc., and MSN Pharmachem Private Limited (collectively, "MSN"):

Delaware Counsel: Geoffrey Grivner of Buchanan Ingersoll & Rooney PC

Lead Counsel: Matthew Fedowitz, Philip Hirschhorn, and Jennifer Liu of Buchanan Ingersoll & Rooney PC

The dispute requiring judicial attention concerns:

1. Whether the MSN Defendants should be permitted to designate their In-House Designee, permitted to access Plaintiffs' Confidential Information in this action, pursuant to Paragraph 5(e) of the Protective Order (D.I. 132).

The Honorable Leonard P. Stark

May 22, 2019

Page 2

Respectfully,

/s/ Megan E. Dellinger

Megan E. Dellinger (#5739)

MED/bac

cc: Clerk of the Court (via hand delivery)
All Counsel of Record (via electronic mail)